WorldCom has had to unnecessarily reject customers' orders for DSL service simply because we have not been provided all relevant loop qualification information.

When WorldCom queries Qwest's loop qualification database using Qwest's IMA/EDI loop make-up tool, we do not always receive all pertinent information. Nielson Decl. ¶ 3. For example, WorldCom may perform a query and find that fiber exists in the loop, in which case we are unable to provide DSL service to that customer. But we are *not* told that a redundant copper facility over which we could provide that customer DSL service is in fact available. Id. Although Qwest suggests that it has populated its database to include spare copper facilities, it has not been WorldCom's experience that this type of information is actually available. Id. Indeed, in the Qwest I July 10 *ex parte* letter, Qwest does not address the issue of whether its loop qualification database contains information about spare copper facilities.[21] Id. Furthermore, in all likelihood, Qwest itself has access to this important information.

Interestingly, in the Commission's Triennial Review proceeding, Qwest is using its maintenance of spare copper facilities to show that competitors are not impaired without access to Qwest's fiber-fed loops.[22] In that proceeding, Qwest claims that it will not remove copper facilities where it has deployed fiber. Yet, Qwest does not show here that its loop qualification database provides DSL competitors, like WorldCom and Covad, with information regarding the existence of spare copper facilities. Until Qwest makes such a showing, it has not demonstrated it provides competitors will all relevant loop make-up information.

[21] Qwest I July 10 *ex parte* letter at Tab 9, at 24-25.
[22] *See* Comments of Qwest Communications, CC Docket No. 01-338, dated April 12, 2002, at 45-46.

B. Qwest Improperly Issues a SOC Before Completing the DSL Order

WorldCom has experienced problems with the accuracy of Qwest's Service Order Completions (SOC) for its DSL orders. Nielson Decl. ¶ 4. For example, WorldCom will receive a SOC for certain DSL orders, but then learn through a customer complaint that Qwest has not yet completed the order. Qwest's premature issuance of SOCs creates provisioning and customer-service problems for WorldCom. Customers are dissatisfied with WorldCom when they do not receive service on the day promised, and we are dissatisfied because a customer will call to report that the order was not installed, yet our systems show that the work has been completed. This makes it much more difficult to respond to the customer's complaint.

In response to concerns raised by competitors in the Qwest I proceeding regarding Qwest's issuance of erroneous SOCs for DSL orders,[23] Qwest instituted changes in the way its central office technicians handle such orders.[24] Specifically, Qwest issued a new management directive that any line sharing order not completed by 4 p.m. should be placed in jeopardy status. Although this new process -- the Central Office Job Aid -- will assist in notifying competitors when their orders are delayed, it is unclear whether it will result in issuing a SOC only when the *actual* central office work is *completed*.[25] In other words, it is not at all clear whether Qwest's new process will correct the problem of Qwest automatically generating SOCs on the due date of the order. This is critical.

On July 8, 2002, WorldCom sent Qwest a request for a root-cause analysis of the erroneous SOC problem. Nielson Decl. ¶ 5, Exhibit 1. Qwest responded to WorldCom

[23] *See, e.g.*, WorldCom Comments at 25.
[24] *See* Qwest I July 12 *ex parte* letter.

on July 30, 2002, stating that it had sent WorldCom jeopardy notices for the orders that WorldCom identified. Id. WorldCom never received jeopardy notices for such orders. As a result, WorldCom is concerned that the issuance of a jeopardy does not stop the issuance of the SOC. Therefore, the jeopardy process may not resolve the SOC issue.

Moreover, if Qwest is auto-completing orders on the due date regardless of whether the work is completed, Qwest's performance results likely are not accurate. Further investigation is warranted. WorldCom intends to follow-up directly with Qwest.

C. Qwest Does Not Provide DSL Service to Many CLEC-Voice Customers

Qwest's refusal to provide DSL service to a customer who has selected a CLEC for UNE-P voice service is anti-competitive. Although Colorado is not the subject of this application, we agree with the Colorado PUC's reply comments in the Qwest I proceeding, that, indeed, such a policy and conduct is "anti-competitive; constitute[s] a potential violation of antitrust laws; and [is] void as a matter of public policy."[26] Qwest's anti-competitive practice is especially harmful to WorldCom as we enter the local market with our Neighborhood voice product and must have a way of providing customers DSL.

In the Arizona SGAT proceeding, Qwest agreed on a 14-state basis to allow CLEC UNE-P voice customers to continue to use Qwest's DSL service. Parties chose not to litigate this issue in many of the states based on Qwest entering into this agreement. Now, however, Qwest is backing out of its agreement in cases where the DSL customer is served by Qwest's preferred ISPs, such as MSN. Many of Qwest's DSL customers

[25] WorldCom Comments at 25, *In re Application by Qwest Communications International, Inc., for Provision of In-Region, InterLATA Services in Colorado, Idaho, Iowa, Nebraska, and North Dakota,* WC Docket No. 02-148, filed July 3, 2002.

[26] Colorado PUC Reply Comments, *In re Application by Qwest Communications International, Inc., for Provision of In-Region, InterLATA Services in Colorado, Idaho, Iowa, Nebraska, and North Dakota,* WC Docket No. 02-148, filed July 29, 2002.

have been transferred to an ISP under Qwest's "Host Volume Discount Program" that offers volume discounts to ISPs. In fact, Qwest transferred a significant portion of its DSL customers to the ISP Microsoft Network (MSN). Customers of the ISPs cannot obtain UNE-P voice service from WorldCom or any other CLEC, unless the CLEC successfully advises the customers to contact their ISP and have their ISP service disconnected and reconnected to a new ISP.[27] Understandably, customers generally will not want to endure this hassle and are turned away from WorldCom and other CLECs by Qwest's anti-competitive business practices.

III. QWEST MUST REDUCE ITS UNE RATES

Qwest's benchmarking methodology used to support its recurring unbundled network element (UNE) rates in Montana, Utah, Washington, and Wyoming fails to accurately reflect the relative minutes of usage in these states. This error results in inflated UNE rates. Switch usage rates are overstated by 12.8 percent in Washington, 9.1 percent in Montana, and 1.1 percent in Utah. In addition, the price squeeze that exists in all four states prevents competitors from providing local service to the mass market on a statewide basis, contravening the public interest.

A. Background

Qwest's recurring UNE rates were set in separate cost proceedings in each of the states for which it is seeking section 271 approval here. For purposes of its section 271

[27] Qwest stated the following in written responses to WorldCom questions about whether Qwest would continue providing DSL service to CLEC-UNE-P voice customers: "Qwest DSL Host Volume Discount Program arrangements (providing Qwest DSL service to end-users on behalf of Volume Internet Service Providers (VISP)) are not available with UNE-P with Qwest DSL." Qwest further stated that "[I]f the line has VISP DSL, and a CLEC is requesting a UNE-P conversion, Qwest will advise the CLEC that they must go back to the End User and advise them that they must contact their data service provider (ISP) to disconnect their existing DSL service. The VISP DSL line must be disconnected prior to an UNE-P order being issued to convert a line to UNE-P or add another Qwest retail DSL service. Qwest will not accept a VSIP disconnect order from the End User...Qwest VISP DSL is not available with UNE-P services."

application, however, Qwest reduced some of its UNE rates in every state in which the rates exceed a benchmark based on the Colorado rates.[28]

To compute the benchmark for the loop rates in Montana, Utah, Washington, and Wyoming, Qwest multiplies the statewide average UNE loop rate adopted in Colorado by the ratio of Colorado loop cost to the state's loop cost, as those costs are determined by the Commission's Synthesis Model (SM).[29] Frentrup Decl. ¶ 4. To derive the rate for the different zones in the states, Qwest multiplies the ratio of this revised statewide average rate to the originally approved statewide average rate by the rates for the individual zones. Id.

Qwest performs a similar operation to derive a new switch usage rate. Frentrup Decl. ¶ 5. First, Qwest derives the ratio of each state's total non-loop costs to Colorado non-loop costs, as determined by the modified SM. It then multiplies that ratio by the total non-loop rate for Colorado to determine each state's allowed total non-loop rate.[30] Id. If that allowed rate is less than the state's approved non-loop rates, Qwest sets the shared transport rate to the lesser of the state-approved rate or the Colorado rate, retains the state's port rate, and adjusts the switch usage rate so that the new rates in total equate to the allowed total non-loop rate. Id.

[28] In general, Qwest has reduced loop, switch usage, and, in some cases, transport rates. However, in the state filings implementing these proposed reductions, Qwest has also proposed other new charges or increased existing charges on competitive local exchange carriers (CLECs), so the net effect of the increases and decreases is unclear. This declaration examines only the effect of changes in the loop, switching, and transport rates.

[29] The SM was developed by the Commission to determine universal service costs. To determine UNE costs, modifications to the SM are needed to remove retail overheads, and to spread the remaining wholesale overhead costs among all elements. The SM as modified in this manner has previously been used by the Commission to perform its benchmark analysis.

[30] The total non-loop rate was computed as one port charge, plus the switch usage rate applied to a basket of 1200 originating and 1200 terminating local minutes and 370 combined state and interstate long distance minutes, plus the shared transport rate applied to that same basket of minutes. Qwest makes assumptions about how much of its local traffic is intraoffice, and how much of its traffic is tandem transport to

B. Qwest's Benchmark Demand Levels Are Inconsistent With Commission Precedent

Qwest assumes the same level of minutes in each of the five states under review to compute a monthly per line non-loop charge.[31] To be consistent with the Commission's previous benchmark analyses, Qwest should use state-specific levels instead.

Use of a constant set of demand in all states is inconsistent with the methodology used by the Commission in prior benchmark analyses. For example, in its most recent section 271 decision, the Commission used state-specific demand data in New York and New Jersey to perform its benchmark analysis.[32] The Commission stated that standardized demand assumptions might be reasonable, where, for example, there is an absence of state-specific demand data,[33] but that is not the case here. Qwest possesses state-specific data. The Commission should be consistent in its decisions about whether BOCs should use state-specific or standard demand assumptions, and not just agree to whatever assumption is put forward by the BOC – undoubtedly whatever assumption will result in higher rates.

State-specific demand data are available for all of the states in this application.[34] Data on dial equipment minutes (DEM) are available from the ARMIS 43-04 report.

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determine the exact number of minutes to which its rates apply. These assumptions are given in detail in the Declarations of Jerrold L. Thompson included in Qwest's 271 application.

[31] Specifically, Qwest assumes 1200 originating and terminating local minutes, and 370 toll and access minutes. Twenty five percent of local minutes are assumed to be intraoffice, and 20 percent of toll minutes are assumed to be tandem routed.

[32] See New Jersey Order ¶ 53.

[33] Id.

[34] Qwest claims that it "does not have studies that support state-specific data that delineate the numbers or percentages of originating and terminating intraLATA toll, intrastate interLATA, and interstate interLATA minutes per line per month, broken down on an intra-switch, inter-switch, and tandem routed basis." Qwest Brief at 164 n.79. In fact, the ARMIS data used herein is broken out into local, state toll, and interstate toll. For the purpose of the benchmark analysis, the only additional disaggregation that is necessary is the split between originating and terminating local minutes, the percent of local minutes that are intraoffice, and the percent of toll minutes (state and interstate combined) that are tandem routed.

Frentrup Decl. ¶ 8. Data on retail switched access lines are available in the ARMIS 43-08 report. Id. In its application, Qwest provides the number of resale, UNE-platform and unbundled loop lines it provides to resellers in each of the four states that are included in the application.[35] Id. These data are presented in Table 1, attached to the Frentrup Declaration.

As seen in Table 1, the minutes of use per-line varies substantially across the states, with Colorado having fewer minutes than any state except Wyoming. Montana, Utah, and Washington have substantially higher minutes per-line than Colorado. Substituting the state specific minutes per-line into Qwest's computation of the benchmark rates results in a 12.8 percent reduction in switch usage in Washington, a 9.1 percent reduction in Montana, and a 1.1 percent reduction in Utah. Frentrup Decl. ¶¶ 2, 9.

In *ex parte* letters filed in support of its first section 271 application, Qwest makes several arguments against using state-specific data.[36] First, although it acknowledges that it possesses state-specific minutes of use per-line by state, it claims that it does not possess studies that would show state-specific data on the splits between interoffice and intraoffice calls, between originating and terminating calls, or between tandem and direct routed calls, all of which are necessary to perform the benchmark analysis.[37] Qwest does not explain why it would be improper to use the state-specific minutes described above in conjunction with the Commission's standard assumptions on these items. Frentrup Decl. ¶ 10. Use of the state-specific minutes combined with the standard mix assumptions

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Qwest's benchmark computation makes some standard assumptions regarding these items, and it is reasonable to apply those assumptions to the state specific demand data as well.

[35] *See* Qwest Brief at 17.

[36] *See* Qwest I July 22 *ex parte* letter, Attachment at 3-6.

[37] *See* Qwest I July 22 *ex parte*, letter, Attachment at 3.

better reflects the different market conditions in the states than does the use of the same set of minutes in all the states. Frentrup Decl. ¶ 10.

Qwest also claims that using the standard assumptions for all states will allow it to simplify its multi-state applications and avoid controversy.[38] However, developing the state-specific minutes of use in the manner described above is straightforward, not burdensome, and, because it better reflects actual market conditions, should alleviate controversy. Frentrup Decl. ¶ 11. Finally, Qwest claims that use of state-specific minutes does not systematically result in higher rates – some states will be allowed higher rates under the state-specific minutes of use, and some will be allowed higher rates using the standard assumptions.[39] In fact, Qwest claims, using state-specific minutes of use from 2001 rather than the standard assumptions would result in a lower benchmark in only 7 of the 13 states in which it has used or plans to use the benchmark methodology. Even if this is correct, it misses the point. The relevant issue is that state-specific minutes more accurately reflect the costs that will be incurred by purchasers of UNEs. Frentrup Decl. ¶ 11. As the Commission has already stated, the demand of the average customer is "the single most informed estimate" of potential CLEC demand.[40]

In addition, the Commission should not hesitate to combine state-specific minutes with standard assumptions for traffic mixes (i.e., interoffice versus intraoffice calls, originating versus terminating calls, or tandem versus direct routed calls). The standard assumptions for traffic mixes are based on industry-wide data and thus reflect the best estimate of the mixes that could be expected in any state. Frentrup Decl. ¶ 12. To ignore a known difference among the state in the minutes-of-use per-line simply because all

[38] See Qwest I July 22 *ex parte* letter, Attachment at 4.
[39] See Qwest I July 22 *ex parte* letter, Attachment at 4-5.

other data for the states is not also known unnecessarily results in excessive UNE rates. Id.

For the four states that are the subject of this section 271 application, use of state-specific minutes-of-use will result in significant reductions in the switch usage rates for Montana, Utah, and Washington, as described above, while allowing a *de minimis* increase in Wyoming. Qwest should adjust its rates accordingly.

C. Qwest's UNE Rates Cause a Price Squeeze

Qwest's UNE rates cause a price squeeze that prevents statewide residential competition in all four states. WorldCom is able to offer our premium-priced Neighborhood product in only certain parts of Washington and Utah. In Montana, we would experience a *negative* gross margin in every zone, and in Wyoming, we would experience a negative gross margin in zones 2 and 3 and a meager gross margin of $1.43 in zone 1.

As shown in Exhibit 1, we perform a price squeeze analysis by subtracting the costs of leasing UNEs from the monthly revenue a carrier would receive if it provided a standard measured product, one feature at the same retail price Qwest charges, and the SLC. From that amount, *i.e.,* the gross margin, a carrier must then cover its own internal costs. As WorldCom has explained previously, internal costs typically include customer service costs, costs associated with customers who don't pay their bills, billing and collections, overhead, marketing costs, and other operational costs, and exceed $10 per line per month, even apart from significant up-front development costs.[41]

[40] See New Jersey Order ¶ 54.

[41] *See, e.g.,* Huffman Decl. ¶¶ 8-12, attached to WorldCom Comments, *In re Application for Verizon New England for Authorization to Provide In-Region, InterLATA Services in Vermont,* CC Docket No. 02-7 (FCC filed Feb. 6, 2002).

Exhibit 1 shows that, of all the zones in all the states subject to this application, we are able to cover our own internal costs in only zone 1 in Washington. It is thus impossible for WorldCom to profitably provide residential UNE-P service to the mass market in most of the territory covered by this application. WorldCom can only offer a premium product – and then only in select zones in the states. Although Qwest improved its UNE rates in many respects by benchmarking to Colorado, there remains a price squeeze in each of the four states for which Qwest has sought section 271 authorization here. Qwest's section 271 application should be denied on public interest grounds because of these price squeezes.

IV. QWEST MUST PROVIDE CUSTOMIZED ROUTING TO WORLDCOM, CONSISTENT WITH FCC PRECEDENT

Qwest refuses to provide customized routing to WorldCom in the way WorldCom has requested and to which it is entitled under the Act and Commission precedent. In particular, the Commission's recent Virginia Arbitration decision reconfirms that Qwest must provide customized routing to WorldCom in the way that WorldCom has requested.[42] Until it does so, Qwest fails to meet checklist items 2 and 7 of section 271.

Customized routing enables a requesting CLEC to designate the particular outgoing trunks associated with unbundled switching provided by the incumbent, which will carry certain classes of traffic originating from the CLEC's customers.[43] One use for customized routing is to carry calls from Qwest's switch to the CLEC's Operator Services and Directory Assistance ("OS/DA") platform in order to allow the CLEC to self-provision OS/DA services to its customers. WorldCom wants to self-provision OS/DA services to its customers and has designated its existing Feature Group D trunks

[42] *See also UNE Remand Order* ¶ 441 n.867; *Louisiana II Order* ¶ 221.

as the trunks over which it wants Qwest to route its customers' OS/DA calls. Qwest refuses to comply with WorldCom's request. Qwest maintains that WorldCom must purchase direct trunks dedicated to OS/DA traffic from each of Qwest's end offices to WorldCom's switches, rather than permitting WorldCom OS/DA traffic to travel over common transport to WorldCom's network.

Qwest's refusal to provide customized routing violates the Act and Commission orders. Specifically, Qwest's conduct violates section 251(c)(3),[44] which requires ILECs to provide nondiscriminatory access to network elements, and sections 271(c)(2)(B)(ii), (vii), which requires successful section 271 applicants to provide access to UNEs pursuant to sections 251(c)(3) and 252(d)(1) and access to OS/DA services. Customized routing is part of the unbundled switching network element.[45] ILECs are not required to provide OS/DA as a UNE if they provide customized routing, pursuant to the UNE Remand Order.[46] Qwest does not provide OS/DA as a UNE and therefore must provide requesting carriers with customized routing.

In the recent Virginia Arbitration decision, the Commission reemphasized its finding in the UNE Remand Order that "[c]ustomized routing permits a *requesting carrier* to specify that the incumbent LEC route, *over designated trunks* that terminate in the requesting carrier's operator services and directory assistance platform, operator services and directory assistance calls that the requesting carrier's customers originate."[47] Accordingly, the Commission required Verizon to reflect in its interconnection

[43] UNE Remand Order ¶ 441 n.867.
[44] 47 U.S.C. § 153 et. seq.
[45] 47 C.F.R. § 51.319(c)(1)(iii)(B) ("all features, functions and capabilities of the switch, which include but are not limited to: (B) All other features that the switch is capable of providing, including but not limited to, customer calling, customer local area signaling service features, and Centrex, as well as any technically feasible customized routing functions provided by the switch.")
[46] *See* UNE Remand Order ¶ 441.

agreement its commitment to provide customized routing for OS/DA calls over WorldCom's Feature Group D trunks.[48] In other words, it is WorldCom, and not Qwest, that is entitled to designate the trunks on which Qwest will route WorldCom's OS/DA traffic. Qwest has no right to decide that WorldCom must establish separate trunks, which would require WorldCom to build an expensive, inefficient, and duplicative network just to carry its customers' OS/DA traffic.

The Commission also recognized the ILECs' obligations to provide customized routing specifically over Feature Group D trunks in its review of a BellSouth Louisiana's section 271 application.[49] Because MCI did not demonstrate that it had actually requested this method of customized routing from BellSouth, the Commission found the record inconclusive. Nonetheless, the Commission concluded that, absent technical infeasibility, an ILEC's failure to provide customized routing using Feature Group D signaling violates the Act. The Commission stated:

> MCI raises a separate challenge to BellSouth's customized routing offering. MCI claims that BellSouth will not "translate" its customers' local operator services and directory assistance calls to Feature Group D signaling. As a result, MCI cannot offer its own operator services and directory assistance services to customers it serves using unbundled local switching. MCI, however, fails to demonstrate that it has requested Feature Group D signaling, and BellSouth claims that it has never received such a request. Thus, the record is inconclusive as to this objection. We believe, however, that MCI may have otherwise raised a legitimate concern. If a competing carrier requests Feature Group D signaling and it is technically feasible for the incumbent LEC to offer it, the incumbent LEC's failure to provide it would constitute a violation of section 251(c)(3) of the Act. Our rules require incumbent LECs, including BOCs, to make network modifications to the extent necessary to accommodate interconnection or access to network elements.[50]

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[47] Virginia Arbitration Order ¶ 533, citing UNE Remand Order at ¶ 441, n.867 (emphasis added).
[48] Virginia Arbitration Order ¶ 535.
[49] Louisiana II Order ¶ 221.
[50] *Id.* ¶ 226.

Here, WorldCom has requested customized routing from Qwest through Feature Group D signaling. WorldCom officially made this request in March, 2002 and raised the issue in 2001 as part of cost dockets and negotiations to amend interconnection agreements.[51] Qwest's assertion that it is technically unable to provide customized routing consistent with our request is not justification for Qwest to skirt the terms of the Act and Commission precedent.[52] The Commission has clearly stated that Qwest must make network modifications necessary to accommodate WorldCom's customized routing request. Several state commissions agree.[53]

Moreover, Qwest's statement that WorldCom has not agreed "to work with Qwest in good faith" on this matter is untrue.[54] WorldCom has helped explain to Qwest how, from a technical standpoint, to provide customized routing in the form requested and has generally worked cooperatively with Qwest to obtain the desired result. Qwest's suggestion that WorldCom submit a bona fide request (BFR) to obtain customized

[51] In June 2001, WorldCom and Qwest negotiated an amendment to their interconnection agreements permitting WorldCom specifically to obtain customized routing over Feature Group D trunks. And in several state regulatory proceedings in 2001, WorldCom filed testimony outlining its request for customized routing from Qwest.

[52] Qwest I Reply Comments, Simpson Reply Decl. ¶ 22.

[53] For example, an Administrative Law Judge in Minnesota concluded that WorldCom and others demonstrated that Qwest improperly did not accommodate technologies used for customized routing as required by the FCC, and therefore required Qwest to offer OS/DA as a UNE. *See In re a Commission Investigation into Qwest's Compliance with Section 271(C)(2)(B) of the Telecommunications Act of 1996; Checklist Items 3, 7, 8, 9, 10, and 12;* OAH Docket No. 12-2500-14485-2, PUC Docket No. P-421/C1-01-1370, State of Minnesota Office of Administrative Hearings for the Minnesota Public Utilities Commission, May 8, 2002. This recommendation was recently adopted by the Minnesota Commission; See also *Application by Pacific Bell Telephone Co. (U 1001 C) for Arbitration of an Interconnection Agreement with MCImetro Access Transmission Services, LLC (U 5253 C) Pursuant to Section 252(b) of the Telecommunications Act of 1996*, Application 01-01-010,CA PUC Decision, (September 20, 2001) at 13; *Petition of MCImetro Access Transmission Services, LLC et al. for Arbitration with Southwestern Bell Telephone Co. under the Telecommunications Act of 1996*, Texas PUC, Docket No. 24542, Arbitration Award (April 29, 2002) at 163-165; *In the Matter of the Application of Ameritech Michigan for Approval of a Shared Transport Cost Study and Resolution*, Case No. V-12622, Opinion and Order (March 19, 2001) at 10-11.

[54] Qwest I Reply Comments, Simpson Reply Decl. ¶ 23.

routing (and its insinuation that by not doing so WorldCom has been uncooperative)[55] is entirely unhelpful, because the BFR process would only result in further delay and expense to WorldCom. Furthermore, Qwest already has in its possession the necessary information to process WorldCom's request.

In addition, Qwest's claim that it technically cannot provide customized routing[56] is inconsistent with Qwest's statements before the Washington UTC, where Qwest testified that no technical impediment exists to providing customized routing over WorldCom's Feature Group D trunks.[57] Rather, Qwest stated that it would not comply with WorldCom's request based on a "business decision."[58] Qwest has also expressed in state proceedings unsubstantiated "regulatory" and "jurisdictional" concerns with WorldCom's request as it relates to the requirement that Qwest would have to convert 411 traffic to 10-digit dialed numbers. WorldCom is not aware of any regulatory or "jurisdictional" impediments to implementing WorldCom's request. Quite the opposite, Commission precedent requires Qwest to provide WorldCom with customized routing in the form requested. Otherwise, Qwest should not gain section 271 authorization.

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[55] Qwest I Reply Comments, Simpson Reply Decl. ¶¶ 29-30.
[56] Qwest I Reply Comments, Simpson Reply Decl. ¶ 28.
[57] *In the Matter of the Continued Costing and Pricing of Unbundled Network Elements, Transport, Termination and Resale,* Washington Utilities and Transportation Commission, Docket No. UT-003013, Transcript ("WA Transcript") at 4682-4684 and 4756-57.
[58] Id. at 4756-57.

CONCLUSION

Qwest's section 271 application for Montana, Utah, Washington, and Wyoming should be denied for the reasons described above.

Respectfully submitted,

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August 1, 2002

CERTIFICATE OF SERVICE

I, Lori Wright, do hereby certify that on this first day of August, 2002, I have caused a copy of WorldCom, Inc.'s Comments in the matter of WC Docket No. 02-189 Application by Qwest Communications International, Inc. for Authorization Under Section 271 to Provide-In-Region InterLATA Service in Montana, Utah, Washington, and Wyoming to be served by hand delivery and/or e-mail on the following:

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